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File Number: 30021-0002

August 6, 2025

**VIA ECF**

The Honorable Jeannette A. Vargas  
United States District Court Judge  
Southern District of New York  
500 Pearl Street, Room 703  
New York, NY 10007  
[VargasNYSDChambers@nysd.uscourts.gov](mailto:VargasNYSDChambers@nysd.uscourts.gov)

Re: *Drew Dixon v. Antonio Marquis "L.A." Reid*, 1:23-cv-09878-JAV  
Letter Regarding Subpoenas to Gamma and AMR Ventures, Inc.

Dear Judge Vargas:

I write in response to your August 1, 2025 request for information regarding our firm's acceptance of service of the subpoenas to Gamma Media Holdings, LLC ("Gamma") and AMR Ventures, Inc. ("AMR")

On April 1, 2025, counsel for Plaintiff Drew Dixon emailed our firm a set of financial discovery, which included document requests directed to our client Defendant Antonio Marquis "L.A." Reid ("Reid"), document subpoenas to Gamma and AMR and deposition subpoenas to Larry Jackson and Richard Johnson (the "Financial Discovery"). In the email, counsel for Plaintiff asked if we would accept service of the four subpoenas. When I received that email, I did not have knowledge about the relationship between Mr. Reid and Gamma and mistakenly assumed that Mr. Reid was involved with Gamma. I learned at Larry Jackson's deposition on May 21, 2025 that my assumption was incorrect.

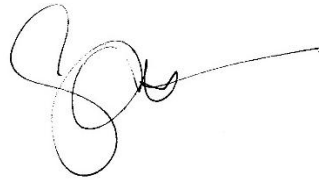
In early April 2025, after receiving the email discussed above, I advised Mr. Reid, his business manager Richard Johnson and his accountant Jeffrey Turner of the Financial Discovery. I thereafter had various communications with Mr. Reid about the Subpoenas, including communications regarding counsel for Plaintiff's efforts to serve Larry Jackson. My understanding based on those communications was that Mr. Reid had authorized me to accept service of the subpoenas on both AMR and Gamma, and I communicated that authorization to counsel for Plaintiff. I sent copies of the AMR and Gamma subpoenas to Richard Johnson, who (throughout this litigation) has acted as a conduit for transmission of documents and information to Mr. Reid with the assumption that the subpoenas would be passed on to the appropriate people.

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I now realize that I mistakenly assumed that Gamma had authorized me to accept service of the subpoena in April 2025 and that Gamma had received a copy of the subpoena from Mr. Johnson. I apologize to the Court and counsel for Plaintiff for the misunderstanding. I was operating under circumstances where communication with our client was often lacking and/or difficult and was doing my best to try to move the Financial Discovery forward.

With respect to AMR, I am not aware of any issues with our firm's acceptance of service of the subpoena directed to AMR or AMR's receipt of that subpoena.

Very truly yours,

A handwritten signature in black ink, appearing to be 'Shawn Holley', with a long horizontal stroke extending to the right.

Shawn Holley